

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

ADAM SINDELL,	)	
	)	
Plaintiff,	)	
	)	CIVIL ACTION FILE
v.	)	
	)	NO. _____
LATONYA COACH, JACOB	)	
CLECKNER, and KYLE	)	
BOERGER, In their individual	)	
and official capacities as Deputies	)	
of the Houston County Sheriff's	)	
Office,	)	
	)	
Defendants.	)	

**NOTICE OF REMOVAL**

COME NOW Defendants in the above-styled civil action, and, pursuant to 28 U.S.C. § 1446(a), file their Notice of Removal, showing the Court as follows:

1.

Defendants are named Defendants in the civil action styled Sindell v. Coach, et al, in the Superior Court of Henry County, State of Georgia, Civil Action File No. **SUCV2022001704** (the "Civil Action"); the Defendants hereby remove this civil action to this Court, on the basis

that the Plaintiff has asserted federal law claims, providing the Defendants with the right of removal.

2.

Copies of all process and pleadings received by any Defendant to date in this action are attached hereto, as well as other materials filed in the Henry County Superior Court.

3.

This Civil Action may be removed to this Court pursuant to 28 U.S.C. § 1141 *et seq.*

4.

Defendant Coach received notice of the Civil Action on or about August 9, 2022. The remaining Defendants have not been served with any lawsuit papers. Therefore, this Notice of Removal is filed within thirty (30) days of notice by the last-served Defendant, as required by 28 U.S.C. § 1446 (b). *Bailey v. Janssen Pharmaceutica, Inc.*, 536 F.3d 1202, 1208-09 (11th Cir. 2008).

5.

This Court has jurisdiction over this Civil Action pursuant to 28

U.S.C. §§ 1331 and 1343 in that the Plaintiff has asserted claims arising under the Constitution or laws of the United States.

6.

This Notice of Removal is filed in the United States District Court for the District and Division encompassing the county where the Civil Action is pending. All named Defendants consent and join in this removal.

WHEREFORE, Defendants respectfully pray that this Civil Action be removed to and proceed in this Court and that no further proceedings be had in the Superior Court of Henry County, Georgia.

Respectfully submitted,

WILLIAMS, MORRIS & WAYMIRE, LLC

/s/ Jason Waymire

JASON C. WAYMIRE

Georgia State Bar No. 742602

Attorney for Defendants

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**CERTIFICATE OF SERVICE**

This will hereby certify that I, the undersigned, have this day served upon all parties **DEFENDANTS' NOTICE OF REMOVAL (with exhibits)** by electronic means in accordance with the United States District Court rules to:

Jordan Johnson

Jessica Burton

5 Dunwoody Park Suite 100  
Atlanta, GA 30338

404.592.9089

Alex@Justice.Law

Jessica@Justice.Law

This 8 day of September, 2022.

WILLIAMS, MORRIS & WAYMIRE, LLC

/s/ Jason Waymire

JASON C. WAYMIRE

Georgia State Bar No. 742602